

Hon. Brian D. Lynch
In Proceedings Under Chapter 13
Hearing Date: September 6, 2023
Time: 1:30 PM
Response Date: August 30, 2023
Location: 1717 Pacific Ave Tacoma, WA
98402

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

Joshua Emmanuel Marroquin, Sandra
Melina Marroquin
Debtor,

Case No: 23-40883 BDL

**DECLARATION OF DEBTORS' IN
SUPPORT OF MOTION TO AVOID
JUDICIAL LIEN**

Joshua Emmanuel Marroquin, Sandra Melina Marroquin declare as follows:

1. We are over the age of eighteen (18) and am competent to testify based upon personal knowledge to the matters stated herein.
2. At the time that we signed the Petition for Bankruptcy we reviewed the Zillow Estimate for the value of our home and it was approximately \$719,200.00 as disclosed in our schedules. We are familiar with our home and properties in and around our home and believe that this number, considering the condition of the home and its status, is a fairly accurate representation of the value we would hope to obtain if it were sold.
3. Attached is a Zillow estimate dated August 1, 2023 showing a slightly higher value for the summertime bump but still well below \$800,000 in value.
4. We owed as of the date of filing \$507,874.44 to Rocket Mortgage on a first Deed of Trust and according to our statements and credit report about \$59,998.00 to Harborstone Credit union on a second Deed of Trust. Relevant portion of our credit report is attached hereto as an exhibit.

DECLARATION OF DEBTORS' IN SUPPORT OF
MOTION TO AVOID JUDICIAL LIEN

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Law Office of Mark McClure, P.S.
1103 W. Meeker Street, Suite 101
Kent, WA 98032
(253) 631-6484

1 We declare under penalty of perjury of the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct to the best of our
knowledge and belief.

3 Dated August 3, 2023

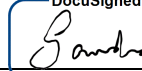
4 at Tacoma, Washington.

DocuSigned by:



850B76FDB6E442C...
Joshua Emmanuel Marroquin
Debtor

DocuSigned by:



29F25003CED0440...
Sandra Melina Marroquin
Co-Debtor

23 **DECLARATION OF DEBTORS' IN SUPPORT OF
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Credit Report

Prepared for Law Office of Mark C. McClure, PS

Report Type: Joint CR	Report Number: 6657365	Client Code: A1209	Reported Date: 05/01/2023
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Mortgage Liabilities with Balances

1 Record(s)

Account Details	Balance Details	Account Dates	Payment Details	Bankruptcy-Specific Address	Bureau Reported Address	Owner & Source
Name: Rocket Mortgage Type: Joint Contractual Liability / Joint Account: XXXXXXXXX2836 Status: Open Term: 360 Months Mortgage, FHA Real Estate Mortgage	Current: \$497,796 High Credit: \$519,022	Date Opened: 02/2021 Last Reported: 04/2023 Last Activity: 03/2023	Monthly: \$3,165 Past Due: \$3,802 Pay History: -1-----	Rocket Mortgage Attn: Bankruptcy 1050 Woodward Avenue Detroit, MI 48226 855-980-3493 Verified: 03/2023	1050 Woodward Ave Detroit, MI 48226 800-508-0944	 TU, EX, EQ  TU, EX, EQ

Non-Mortgage Liabilities with Balances

8 Record(s)

Account Details	Balance Details	Account Dates	Payment Details	Bankruptcy-Specific Address	Bureau Reported Address	Owner & Source
Name: Harborstone Credit Uni Type: Joint Contractual Liability / Joint Account: XXXXXXXX8020 Status: Open, Current Account Term: N/A Revolving, Check Credit Or Line Of Credit	Current: \$59,998 High Credit: \$60,000	Date Opened: 01/2022 Last Reported: 03/2023 Last Activity: 03/2023	Monthly: \$599 Past Due: \$0 Pay History: 1111-----	Harborstone Credit Union Attn: Bankruptcy PO Box 4207 Tacoma, WA 98438 800-523-3641 Verified: 12/2022	Pob 4207 Tacoma, WA 98438 800-523-3641	 TU, EX, EQ  TU, EX, EQ
Name: Advantis Cu Type: Joint Contractual Liability / Joint Account: XXXXXX0143 Status: Open, Charge Off for \$54092 Term: 180 Months Installment, Recreational	Current: \$54,092 High Credit: \$54,092	Date Opened: 02/25/2021 Last Reported: 03/31/2023 Last Activity: 11/30/2022	Monthly: \$0 Past Due: \$0 Pay History: ----3211----	Advantis Credit Union Attn: Bankruptcy PO Box 14220 Portland, OR 97293 Verified: 09/2022	3010 Se Belmont Portland, OR 97223 503-234-9851	 TU, EQ  TU, EQ
Name: Potlatch #1 Type: Individual / Applicant Account: XXXXXX0010 Status: Open, FIXED RATE Term: 72 Months Installment, Automobile	Current: \$30,350 High Credit: \$33,693	Date Opened: 01/15/2022 Last Reported: 03/31/2023 Last Activity: 03/31/2023	Monthly: \$931 Past Due: \$0 Pay History: C11C1CC1CCCC	P1FCU Attn: Bankruptcy 1015 Warner Ave Lewiston, ID 83501 Verified: 11/2022	1025 Warner Ave Lewiston, ID 83501 208-746-8900	 TU, EQ

Note: Source represents who reported the specific account. (TU = TransUnion, EQ = Equifax, EX = Experian, LN = LexisNexis). For a full explanation of each category, see "How to read a tradeline" at the end of this report.